

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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Civil Action No. 4:20-cv-00957-SDJ

**DEFENDANT GOOGLE LLC'S UNOPPOSED  
MOTION FOR LEAVE TO FILE UNDER SEAL**

Defendant Google LLC ("Google") respectfully files this motion to seal the unredacted copy of the Second Declaration of Andrew Rope in support of Google's Motion to Transfer Venue and the unredacted copy of the Declaration of Bryce L. Callahan in support of Google's Motion to Transfer Venue. Concurrent with this motion, Google has filed its Reply in support of its Motion to Transfer Venue Pursuant to 28 U.S.C. §1404(a). Google supported certain factual statements in the Reply with the Second Declaration of Andrew Rope and the Declaration of Bryce L. Callahan, which were appended to the Reply in redacted form. Dkt. 61.

Mr. Rope's Second Declaration and Mr. Callahan's Declaration identify certain persons who were signatories to the Google-Facebook agreement at issue in Count IV or who were deposed as part of the Plaintiff States' and the U.S. Department of Justice's investigation. They also identify these individuals' work locations. Because the Declarations reflect sensitive personal information of current or former Google employees or other persons, Google redacted this information in the publicly-filed versions. Google also filed Exhibits B1 and B2 under seal, as they reflected the same personal information that was redacted in Mr. Callahan's Declaration.

Google seeks leave to file the unredacted copy of the Second Declaration of Andrew Rope, the unredacted copy of the Declaration of Bryce L. Callahan, and Exhibits B1 and B2 under seal. Granting this Motion will protect personal information and facilitate proper treatment of confidential information produced pursuant to the Texas Antitrust Act.

### CONCLUSION

For these reasons, Google respectfully requests that the Court grant Google leave to seal the unredacted copy of the Second Declaration of Andrew Rope in support of Google's Motion to Transfer Venue, the unredacted copy of the Declaration of Bryce L. Callahan in support of Google's Motion to Transfer Venue, and Exhibits B1 and B2 to Google's Reply.

Dated: February 9, 2021

Respectfully submitted,

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**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7(h), I certify that on February 8, 2021, Eric Mahr, counsel for Google, conferred by e-mail with Ashley Keller and Zeke DeRose, counsel for the State of Texas, regarding whether plaintiffs opposed this motion. Mr. Keller indicated that plaintiffs do not oppose.

/s/ R. Paul Yetter

R. Paul Yetter

**CERTIFICATE OF SERVICE**

I certify that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on this 9th day of February, 2021. As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Bryce L. Callahan

Bryce L. Callahan